

**WINDELS MARX LANE & MITTENDORF, LLP**

156 West 56th Street  
New York, New York 10019  
Tel: (212) 237-1000  
Fax: (212) 262-1215

*Special Counsel for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

ROYAL BANK OF CANADA; GUERNROY  
LIMITED; ROYAL BANK OF CANADA  
(CHANNEL ISLANDS) LIMITED; ROYAL  
BANK OF CANADA TRUST COMPANY  
(JERSEY) LIMITED; ROYAL BANK OF  
CANADA (ASIA) LIMITED; ROYAL BANK OF  
CANADA (SUISSE) S.A.; RBC DOMINION  
SECURITIES INC.; and RBC ALTERNATIVE  
ASSETS, L.P.;

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 12-01699 (SMB)

**NOTICE OF AGENDA FOR MATTER SCHEDULED  
FOR HEARING ON JANUARY 13, 2021 AT 10:00 A.M.**

**CONTESTED MATTER**

**12-01699; Picard v. Royal Bank of Canada, et al.**

- A. Memorandum of Law in Support of Motion to Stay (related document(s)115) filed by Anthony L. Paccione on behalf of GUERNROY LIMITED, RBC ALTERNATIVE ASSETS, L.P., RBC DOMINION SECURITIES INC., ROYAL BANK OF CANADA, ROYAL BANK OF CANADA (ASIA) LIMITED, ROYAL BANK OF CANADA (CHANNEL ISLANDS) LIMITED, ROYAL BANK OF CANADA (SUISSE) S.A., ROYAL BANK OF CANADA TRUST COMPANY (JERSEY) LIMITED. (Paccione, Anthony) (Filed: 11/24/2020) [ECF No. 116]
- B. Motion to Stay \*Corrected Entry\* filed by Anthony L. Paccione on behalf of GUERNROY LIMITED, RBC ALTERNATIVE ASSETS, L.P., RBC DOMINION SECURITIES INC., ROYAL BANK OF CANADA, ROYAL BANK OF CANADA (ASIA) LIMITED, ROYAL BANK OF CANADA (CHANNEL ISLANDS) LIMITED, ROYAL BANK OF CANADA (SUISSE) S.A., ROYAL BANK OF CANADA TRUST COMPANY (JERSEY) LIMITED. (Attachments: # 1 Notice Of Motion # 2 Declaration Of Mark T. Ciani In Support # 3 Exhibit A # 4 Exhibit B # 5 Exhibit C - Proposed Order) (Paccione, Anthony) (Filed: 11/25/2020) [ECF No. 118]

**Objections Due:** December 30, 2020

**Objection Filed:**

- C. Memorandum of Law in Opposition to Defendants' Motion to Stay filed by Howard L. Simon on behalf of IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC. (Filed: 12/30/2020) [ECF No. 120]

**Replies Due:** January 10, 2021

**Replies Filed:**

- D. Reply In Further Support Of Defendants' Motion To Stay (related document(s)118) filed by Anthony L. Paccione on behalf of GUERNROY LIMITED, RBC ALTERNATIVE ASSETS, L.P., RBC DOMINION SECURITIES INC., ROYAL BANK OF CANADA, ROYAL BANK OF CANADA (ASIA) LIMITED, ROYAL BANK OF CANADA (CHANNEL ISLANDS) LIMITED, ROYAL BANK OF CANADA (SUISSE) S.A., ROYAL BANK OF CANADA TRUST COMPANY (JERSEY) LIMITED. (Attachments: # 1 Declaration Of Mark T. Ciani In Further Support Of Defendants'

Motion To Stay # 2 Exhibit D # 3 Exhibit E # 4 Exhibit F) (Filed: 1/8/2021) [ECF No. 124]

**Status:** This matter is going forward.

Dated: New York, New York  
January 12, 2021

**WINDELS MARX LANE & MITTENDORF, LLP**

/s/ Howard L. Simon

Howard L. Simon ([hsimon@windelsmarx.com](mailto:hsimon@windelsmarx.com))

Kim M. Longo ([klongo@windelsmarx.com](mailto:klongo@windelsmarx.com))

156 West 56<sup>th</sup> Street

New York, New York 10019

Telephone: (212) 237-1000

Facsimile: (212) 262-1215

*Special Counsel for Irving H. Picard, Trustee for  
the Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*